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**VIA CM/ECF**

The Honorable Analisa Torres  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10017


RE: *Chen-Oster, et al. v. Goldman, Sachs & Co.*, No. 10 Civ. 6950 (AT) (RWL)

Dear Judge Torres:

Plaintiffs respond briefly to Goldman Sachs's letter seeking to redact from the public docket information contained within Ex. C to its opposition to Plaintiffs' request for records regarding Goldman Sachs's trial witnesses. ECF No. 1429. Goldman Sachs describes Exhibit C as a "worker profile information form[]." *Id.* Contrary to its suggestion, Goldman Sachs did not share Exhibit C with Plaintiffs or meaningfully describe the document's content ahead of its filing last night. Plaintiffs did not—and indeed could not—take a position on Goldman Sachs's redaction request. Having now seen Exhibit C, Plaintiffs do not object to the redactions Goldman Sachs has made from the public docket. However, Plaintiffs note for the Court that while Goldman Sachs seeks leave only to redact "the employee's name and email address," Exhibit C actually contains many more redactions, including redactions that extend beyond those permissible without a Court order. *See* ECF No. 1431-3.

Additionally, Plaintiffs are concerned by the significant redactions Goldman Sachs has made from the information forms shared even confidentially with Plaintiffs. To be clear, these forms are no substitute for complete personnel files, which were produced for comparators, and contain, inter alia, performance reviews and internal complaints. *See* ECF No. 1425 (detailing Plaintiffs' need for this information, and the lack of burden to Goldman Sachs in producing it). However, to the extent the information forms may substitute for portions of a personnel file documenting employment dates, promotions, leaves of absences, etc., Goldman Sachs should be ordered to reproduce the forms at once without redaction, subject to the full protections of the protective orders in this case.

Respectfully submitted,

  
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